October 24, 2000

U.S. Food and Drug Administration Dockets Management Branch 5600 Fishers Lane, Room 1061 Rockville, MD 20785

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## Gentlemen:

I am writing to provide comments on Farm Sanctuary's petition (Docket No. 98P-0151/CP1) to prohibit the slaughter of downed animals.

The marketing and slaughter of downed animals causes intolerable animal suffering and poses an unnecessary risk to human health. Animals who are too sick or injured even to stand should not be allowed to enter the human food chain.

In addition to posing an increased risk for bacterial contamination, there is evidence that some downed animals may be afflicted with a form of Bovine Spongiform Encephalopathy, a disease which has been linked to a fatal human illness, Creutzfeldt-Jakob Disease.

It is practically impossible to move downed animals humanely, and they are typically pushed with tractors or dragged with chains which are inhumane practices that cause injuries ranging from bruises and abrasions, to broken bones and torn ligaments.

Downed animals comprise a very small percentage of animals that are slaughtered, and prohibiting their marketing will cause no undue economic hardship.

Industry experts have estimated that 90% of downed animals can be prevented with better care and handling. Removing the market for downed animals will provide an incentive for the industry to prevent downed animals in the first place.

Sincerely,

Damon R. Phillips

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